

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESALE PRICE
LITIGATION

MDL NO. 1456

THIS DOCUMENT RELATES TO:

ALL ACTIONS

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

PLAINTIFFS' PROPOSED JURY QUESTIONNAIRE OR *VOIR DIRE*

Juror First Name and Last Initial _____

Part 1 General Information

1. Juror First Name:

2. Gender: Male _____ Female _____
3. Age: _____
4. Marital status or partnered living situation:

5. Do you have Children: No _____ Yes _____ If yes: # _____
6. Your highest education:

7. Spouse/partner's highest education:

8. "Name of neighborhood" or "community area" you live in:

9. Your occupation:

10. Spouse/partner's occupation:

Part 2 Work Experience or Special Training

Have you, or has anyone close to you, had specialized training, education, work or life experience in any of the following fields or areas?

11. Civil or criminal law, courts, criminal justice or other aspects of the legal or law enforcement fields.
No _____ Yes _____ If yes, please briefly describe: _____

12. Pharmaceutical field in any capacity, including research, administration, marketing, distribution, etc.
No _____ Yes _____ If yes, please briefly describe: _____

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13. Medical field in any capacity, including health care provider, health-care administrator.

No _____ Yes _____ If yes, please briefly describe: _____

14. Investigations such as private investigations, insurance, auditing or investigations.

No _____ Yes _____ If yes, please briefly describe: _____

15. Insurance or claims, or having any relation to the placing, evaluating or processing of claims of any kind.

No _____ Yes _____ If yes, please briefly describe: _____

Part 3 Opinions

16. Do you have strong feelings about pharmaceutical companies with regard to their pricing policies?

No _____ Yes _____ If yes, please briefly describe: _____

17. Do you have strong feeling about whether pharmaceutical companies make too much profit in comparison to other businesses?

No _____ Yes _____ If yes, please briefly describe: _____

18. Do you have strong feelings about whether pharmaceutical companies are under-regulation in comparison to other businesses?

No _____ Yes _____ If yes, please briefly describe: _____

Juror First Name and Last Initial _____

19. Do you have any strong feelings about class actions?
No _____ Yes _____ If yes, please briefly describe: _____

Part 4 Experiences

20. Is anyone in your family presently receiving benefits as part of Medicare or Medicare Part B?
No _____ Yes _____ If yes, please briefly describe: _____

21. Has anyone in your family ever had difficulty affording any type of medication?
No _____ Yes _____ If yes, please briefly describe: _____

22. Has anyone in your family ever felt that a doctor directed them to take a particular medication for any other reason than the doctor's belief that it was the most appropriate medication available?
No _____ Yes _____ If yes, please briefly describe: _____

23. Has anyone in your family ever been prescribed a medication in the United States that you thought could be obtained at a lower cost from a Canadian pharmacy?
No _____ Yes _____ If yes, please briefly describe: _____

24. Has anyone in your family received free drugs or been in a patient assistance program?
No _____ Yes _____ If yes, please briefly describe: _____

Juror First Name and Last Initial _____

25. Has anyone in your family been involved in a class action?
No _____ Yes _____ If yes, please briefly describe: _____

CERTIFICATE OF SERVICE

I hereby certify that I, Steve W. Berman, an attorney, caused a true and correct copy of the foregoing **PLAINTIFFS' PROPOSED JURY QUESTIONNAIRE OR VOIR DIRE** to be delivered to all counsel of record by electronic service pursuant to Paragraph 11 of the Case Management Order No. 2, by sending on May 2, 2007, a copy to LexisNexis File and Serve for Posting and notification to all parties

By /s/ Steve W. Berman
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